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a memorandum and a Local Rule 56.1 statement of undisputed material facts and exhibits, which are incorporated herein by reference.

WHEREFORE, defendants respectfully request that this court grant defendants' motion for summary judgment and grant such further relief this court deems equitable and just.

DATED: December 17, 2025

Respectfully submitted,

BY: /s/ Michael J. Dinard
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CERTIFICATE OF SERVICE

I hereby certify that, on **December 17, 2025**, I submitted with the Clerk for the Northern District of Illinois using the Court's electronic filing system or CM/ECF **Defendants' Motion for Summary Judgment**, which served a copy to all counsel of record.

/s/ Michael J. Dinard
MICHAEL J. DINARD
Assistant Corporation Counsel